

APPENDIX C

**ARMY CORPS OF ENGINEERS' LETTER
DATED MAY 25, 1995**



DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3733
SEATTLE, WASHINGTON 98124-2333

REPLY TO
ATTENTION OF

MAY 25 1995

RECEIVED

MAY 30 1995

Regulatory Branch

Gene Fong, Division Administrator
Federal Highway Administration
711 South Capitol Way, #501
Olympia, Washington 98501

ENVIRONMENTAL AFFAIRS

Reference: Edmonds Ferry Terminal

Dear Mr. Fong:

Thank you for your letter of April 28, 1995, concerning the Environmental Impact Statement being prepared for the Edmonds Ferry Terminal project. One of my staff has since attended a scoping meeting for the project, and it appears that your currently preferred alternative would require a standard individual Department of the Army (DA) permit pursuant to Section 10 of the 1899 Rivers and Harbors Act. Accordingly, the Seattle District, US Army Corps of Engineers (Corps), agrees to be a cooperating agency in the further preparation of the Environmental Impact Statement.

We currently see no involvement under Section 404 of the Clean Water Act. A wetland, part of the former delta of Willow Creek, does exist adjacent to an area where the terminal could be built under the preferred alternative. That wetland is the subject of ongoing restoration efforts, and has been designated a wildlife sanctuary by the City of Edmonds. The Corps highly recommends that you avoid any impacts to the wetland. The sanctuary status of the wetland will make permitting extremely difficult, and the sequencing requirements of the "Section 404/NEPA/SEPA Merger Agreement" places a "high priority" on avoidance of impacts to wetlands and other waters of the U.S.

Just south of the wetland is a former stormwater detention basin, now being cleaned up under the State of Washington's Model Toxic Control Act. The basin may continue to be used for stormwater detention by the ferry terminal, and neither the basin's current cleanup nor future uses for stormwater detention will require DA permits.

As a cooperating agency, we will be most concerned about the project's need and purpose, alternative locations and designs, and impacts on the aquatic environment. From the scoping meeting, we learned that the preferred alternative places the ferry boats some 1,500 feet (nearly a third of a mile) from the terminal building, raising the need for some kind of high-capacity people mover. Given the installation and maintenance

costs of such a system, and the difficulties its breakdown or other non-operation modes would impose on foot commuters (e.g., the elderly, parents with toddlers, people with suitcases or packages, the disabled, passengers almost late for a ferry), we question the practicability of the design.

Mr. Jack Kennedy will be the Corps staff contact person for this project. If you have any questions on these comments, please contact him at telephone (206) 764-3495.

Sincerely,

Thomas F. Mueller
Chief, Regulatory Branch

Copy Furnished:

Sandra Stephens
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